

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN

Plaintiff

V

McCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, ET AL

Defendants

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CIVIL NO.: 24CV01136

**PLAINTIFF, ALAN GOLDMAN'S REPLY TO "DEFENDANTS' RESPONSE TO
PLAINTIFF'S MOTION REQUESTING AN ORDER TO MODIFY PREVIOUS COURT ORDER"
(DOCUMENT NUMBER 87)**

TO THE HONORABLE MAGISTRATE JUDGE MORGAN:

COMES NOW Plaintiff, Alan B. Goldman, by and through his undersigned counsel, and respectfully moves this Honorable Court to modify its recent Order entered as Document Number 84. In support thereof, Plaintiff states as follows:

1. As the court can take notice, attorney Manuel San Juan did not send any email transmissions to notify Plaintiff's undersigned counsel in regard to ever having signed and sent the Non-Disclosure Agreement referenced to in the email transmissions that were marked as exhibits in "Defendants' Response to Plaintiff's Motion Requesting an Order to Modify Previous Court Order" (Document Number 87).
2. The undersigned counsel avoids filing or submitting any allegations against opposing counsel that may question their honesty, or their integrity. For example, it seems to us that averring "an error or omission" is sufficient but alleging "falsehoods" or "false" implies an intent by opposing counsel to lie to the court, which would be an offense against the judicial system and participating in unethical conduct.

3. In view of counsel Manuel San Juan's unsupported imputations against the Plaintiff's undersigned counsel, it is respectfully requested that an Order be entered directing Mr. Manuel San Juan to provide any evidence to support any imputations of such nature against the undersigned counsel, or in the alternative, that an Order be entered ordering said "Defendants' Response to Plaintiff's Motion Requesting an Order to Modify Previous Court Order" be stricken from the record of this case.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff, Alan Goldman respectfully requests from this Honorable Court to take notice of this motion and that an Order be entered directing Mr. Manuel San Juan to provide any evidence to support any imputations of such nature against the undersigned counsel, or in the alternative, that an Order be entered ordering said Defendants' Response to Plaintiff's Motion Requesting an Order to Modify Previous Court Order be stricken from the record of this case, and to grant any other remedy that this Court deems to be just and proper.

RESPECTFULLY SUBMITTED.

In Miami, Florida, on the 4th day of February 2025.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 4th day of February 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

s/Francisco M. López-Romo
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